

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN**

In re Lee David Mork, Jr.,)	
)	
Debtor.)	Case No. 3-20-12414
)	Chapter 13
)	

RESPONSE TO TRUSTEE’S MOTION TO DISMISS

Lee David Mork, Jr. (“Debtor”) through her counsel, Michael J. Watton, and the Watton Law Group, hereby responds to the Motion to Dismiss filed by the Chapter 13 Trustee.

Debtor lost his job shortly after filing, causing him to fall behind on the plan payments. Debtor has secured new employment and is working with counsel to provide an amended plan and budget forthwith. Debtor will commence making regular payments to the Chapter 13 Trustee.

Wherefore, the Debtor respectfully requests that the Court deny the Trustee’s Motion to Dismiss and hold a hearing on the matter.

Date: November 19, 2020

/s/ Michael J. Watton
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A copy of the foregoing filed electronically
on November 19, 2020 with:

Clerk
United States Bankruptcy Court
120 North Henry Street
Madison, WI 53701

Copies of the foregoing mailed or sent electronically
if the party named accepts electronic service
this November 19, 2020 to:

Mark Harring
Chapter 13 Trustee
131 West Wilson Street, Suite 1000
Madison, WI 53703-3260

Office of the United States Trustee
780 Regent Street, Suite 304
Madison, WI 53715

/s/ Jessica Renzaglia, Paralegal
(Mailed and filed by)

Mork
Case No. 3-20-12414